

# EXHIBIT L

**From:** Andrew Brettler abrettler@berkbrettler.com

**Subject:** Re: Bonnell / Doe

**Date:** October 7, 2025 at 8:32 AM

**To:** petersjoan petersjoan@bellsouth.net

**Cc:** Carlos Garcia Perez cgarciaperez@smgqlaw.com, Gustavo D. Lage glage@smgqlaw.com, Andrea Garcia agarciaw2@gmail.com, Angie Velando angie@smgqlaw.com, Robert "Bob" L. Raskopf rraskopf@bilzin.com, Patricia M. Patino ppatino@bilzin.com, Jake Camara jcamara@berkbrettler.com, Joel Sichel jsichel@berkbrettler.com, Regina Peter rpeter@berkbrettler.com, Maria Favela mfavela@berkbrettler.com

Joan:

We don't need your agreement to take Mr. Bonnell's deposition off-calendar so that it can be scheduled close in time with Plaintiff's deposition. If you are unwilling to cooperate, we will seek Court intervention. Not only is it simply a matter of common courtesy and professionalism to avoid inconveniencing parties and counsel with unnecessary travel, it is a matter of common sense and practicality. That Plaintiff refuses to make herself available for deposition in Miami—where, as you point out, she filed her lawsuit—at anytime during the month of October, and then refuses to coordinate the parties' respective depositions in November is unreasonable.

Regarding the additional matters you wish to discuss, please see our letter correspondence dated, September 22 and September 30. To date, we have not received responses from you or your co-counsel.

Speak shortly.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
9119 W. Sunset Blvd. | West Hollywood, CA 90069  
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On Oct 7, 2025, at 8:19 AM, petersjoan <petersjoan@bellsouth.net> wrote:

Andrew, we remind you that this case is pending in the SDFL, not in CA.

We cannot agree to move the Defendant's deposition from November 6. The date was previously noticed and confirmed by all parties, and our team and the court reporter have been scheduled accordingly.

We understand that you are based in California; however, Defendant is represented by two Florida-admitted attorneys who can attend in person or defend the deposition. You may, of course, appear remotely if you prefer.

In light of these facts and the existing discovery schedule, we intend to proceed on November 6 as noticed.

Regarding other additional matters to discuss, and time permitting, we include the following:

1. Defendant's failure to provide amended answers to RFAs.
2. Defendant's failure to provide amended answers to ROGs.
3. Defendant's incomplete, deficient document production and failure to provide any metadata or hash values from the time of collection.
4. Defendant's failure to provide any contact information for individuals identified in his Initial Disclosures.
5. Defendant's failure to provide any responses received from multiple non-party subpoenas.

thank you,  
Joan

On Tuesday, October 7, 2025 at 09:59:03 AM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

We will discuss at 9am PDT, but as indicated previously, we are not going to agree to produce Mr. Bonnell for an in-person deposition in Miami on Nov. 6 only to have to fly back there two weeks later to take Plaintiff's deposition. The depositions will be conducted close in time. Plaintiff can decide whether she wants the depositions to occur at the beginning of Nov., or at the end.

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On Oct 7, 2025, at 6:55 AM, Carlos Garcia Perez <cgarciaperez@smgqlaw.com> wrote:

Again, your client's deposition date is a non-issue unless its agreed by the parties or there is a court order. We have never agreed to change your client's deposition date. Your self-serving email does not change that fact. Thank you.

**Carlos A. Garcia Perez**  
**Partner**

<image001.png>

201 Alhambra Circle | Suite 1205 | Miami, Florida 33134  
Office: 305.377.1000 | Fax: 855.327.0391  
[cgarciaperez@smgqlaw.com](mailto:cgarciaperez@smgqlaw.com) | [SMGQLAW.com](http://SMGQLAW.com)

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**From:** Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)>  
**Date:** Tuesday, October 7, 2025 at 9:36 AM  
**To:** Carlos Garcia Perez <[cgarciaperez@smgqlaw.com](mailto:cgarciaperez@smgqlaw.com)>  
**Cc:** petersjoan <[petersjoan@bellsouth.net](mailto:petersjoan@bellsouth.net)>, Gustavo D. Lage <[GLage@smgqlaw.com](mailto:GLage@smgqlaw.com)>, Andrea Garcia <[agarcia2@gmail.com](mailto:agarcia2@gmail.com)>, Angie Velando <[angie@smgqlaw.com](mailto:angie@smgqlaw.com)>, Robert "Bob" L. Raskopf <[rraskopf@bilzin.com](mailto:rraskopf@bilzin.com)>, Patricia M. Patino <[Ppatino@bilzin.com](mailto:Ppatino@bilzin.com)>, Jake Camara <[jcamara@berkbrettler.com](mailto:jcamara@berkbrettler.com)>, Joel Sichel <[jsichel@berkbrettler.com](mailto:jsichel@berkbrettler.com)>, Regina Peter <[rpeter@berkbrettler.com](mailto:rpeter@berkbrettler.com)>, Maria Favela <[mfavela@berkbrettler.com](mailto:mfavela@berkbrettler.com)>  
**Subject:** Re: Bonnell / Doe

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Not so Carlos. The main purpose of our call is to discuss deposition scheduling of *both* parties, as laid out in my email of October 3 at 3:23 p.m. We also intend to cover points 1-4 in my email from last night. Speak soon.

Sincerely,  
**Andrew B. Brettler** | BERK BRETTLER LLP  
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On Oct 7, 2025, at 4:43 AM, Carlos Garcia Perez <[cgarciaperez@smgqlaw.com](mailto:cgarciaperez@smgqlaw.com)> wrote:

Good morning I hope you are all doing well. The only issue on the deposition schedule is when and how you will take Plaintiff's deposition. Your client deposition date was agreed by the parties and properly noticed. Respectfully only a court order or an agreement by the parties may cancel or move the deposition date. We do not agree to change or cancel your client's deposition date. Thank you and we are looking forward to the conversation at 12. Carlos

**Carlos A. Garcia Perez**  
**Partner**

<image001.png>

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**From:** Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)>  
**Date:** Monday, October 6, 2025 at 6:50 PM  
**To:** petersjoan <[petersjoan@bellsouth.net](mailto:petersjoan@bellsouth.net)>  
**Cc:** Carlos Garcia Perez <[cgarciaperez@smgqlaw.com](mailto:cgarciaperez@smgqlaw.com)>, Gustavo D. Lage <[GLage@smgqlaw.com](mailto:GLage@smgqlaw.com)>, Andrea Garcia <[agarcia2@gmail.com](mailto:agarcia2@gmail.com)>, Angie Velando <[angie@smgqlaw.com](mailto:angie@smgqlaw.com)>, Robert "Bob" L. Raskopf <[rraskopf@bilzin.com](mailto:rraskopf@bilzin.com)>, Patricia M. Patino <[ppatino@bilzin.com](mailto:ppatino@bilzin.com)>, Jake Camara <[jcamara@berkbrettler.com](mailto:jcamara@berkbrettler.com)>, Joel Sichel <[jsichel@berkbrettler.com](mailto:jsichel@berkbrettler.com)>, Regina Peter <[rpeter@berkbrettler.com](mailto:rpeter@berkbrettler.com)>, Maria Favela <[mfavela@berkbrettler.com](mailto:mfavela@berkbrettler.com)>  
**Subject:** Re: Bonnell / Doe

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Great. Happy to move the call to 9:00 a.m. PDT / 12:00 p.m. EDT tomorrow. In addition to discussing the deposition scheduling matter, we'll also use the call tomorrow as an opportunity to meet and confer with you regarding:

- 1) Plaintiff's incomplete document production;
- 2) Plaintiff's failure to provide amended responses to the requests for production;
- 3) Lauren Hayden's failure to respond to the subpoena or produce any documents responsive to the subpoena;
- 4) Plaintiff's failure to provide a current telephone number and/ email address for Abby Mc [REDACTED].

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
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On Oct 6, 2025, at 3:42 PM, petersjoan <[petersjoan@bellsouth.net](mailto:petersjoan@bellsouth.net)> wrote:

Sorry, I meant to say that noon works for Carlos.

On Monday, October 6, 2025 at 05:38:36 PM EDT, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

I know 1pm works for him. That's the time he requested. You asked to move the call to 12pm. I'd like to make sure that Carlos is available to participate on the call if we reschedule it. Thanks.

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On Oct 6, 2025, at 2:36 PM, petersjoan <[petersjoan@bellsouth.net](mailto:petersjoan@bellsouth.net)> wrote:

yes, 1 pm does work for Carlos.

On Monday, October 6, 2025 at 05:15:32 PM EDT, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

Carlos requested a call at 1:00 p.m. EDT tomorrow. Does 12:00 p.m. also work for him?

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On Oct 6, 2025, at 1:29 PM, Joan Peters <[petersjoan@bellsouth.net](mailto:petersjoan@bellsouth.net)> wrote:

Can we speak at noon EDT tomorrow instead of one?

On Oct 6, 2025, at 3:09 PM, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

All:

Carlos suggested a call tomorrow at 10:00 a.m. PDT /